

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

DEBBI HYATT, as the Parent and Next
Friend of G.J.H.,

Plaintiff,

v.

BOARD OF REGENTS OF OKLAHOMA
COLLEGES ex rel. SOUTHWESTERN
OKLAHOMA STATE UNIVERSITY;
THE OFFICE OF JUVENILE AFFAIRS;
ROBERT E. CHRISTIAN, in his individual
and Official Capacities; JANA WAFFLE, in
her Individual and Official Capacities;
JOHN DOES, in their Individual and
Official Capacities;

Defendants.

Case No. CIV-12-1293-D

**DEFENDANTS OJA AND CHRISTIAN'S AGREED MOTION TO
WITHDRAW AND SUBSTITUTE COUNSEL OF RECORD**

COME NOW Defendants OJA and Robert Christian, by and through Assistant Attorney General Craig M. Regens, to respectfully request that this Court enter an order permitting the undersigned counsel to withdraw as their counsel of record and substituting Assistant Attorney General Richard Mann as counsel of record. In support of their Motion, Defendants show the Court as follows:

1. Defendants are currently represented by AAG Craig M. Regens;
2. On March 1, 2013, AAG Richard Mann entered his appearance [Doc. 12] for OJA and Christian;

3. The Office of the Attorney General has reviewed Plaintiff's claims and did not identify a current conflict of interest; however, OAG prefers to approach the assignment of AAGs to represent the Defendants in a cautious manner, so that if a conflict develops once the suit is filed in a court that has subject matter jurisdiction to hear claims for money damages against OJA and SWOSU, Defendants will not be compelled to find new representation during the litigation of the case;

4. AAG Regens will continue to represent the Board of Regents of Oklahoma Colleges *ex rel.* Southwestern Oklahoma State University; and

5. The undersigned counsel has conferred with representatives of OJA, Christian, the Board of Regents of Oklahoma Colleges, Southwestern Oklahoma State University, and Plaintiff's counsel. None object to his withdrawal as counsel of record or AAG Mann's substitution as counsel of record for OJA and Christian.

CONCLUSION

Defendants OJA and Christian respectfully request that this Court enter an order (1) permitting AAG Regens to withdraw as their counsel of record and remain counsel of record for the Board of Regents of Oklahoma Colleges *ex rel.* Southwestern Oklahoma State University and (2) substituting AAG Mann as OJA and Christian's counsel of record.

Respectfully submitted:

s/ Craig M. Regens

CRAIG M. REGENS, OBA # 22894

Assistant Attorney General

Oklahoma Attorney General's Office

Litigation Section

313 NE 21st Street

Oklahoma City, Oklahoma 73105

Telephone: (405) 521-3921

Facsimile: (405) 521-4518

Email: craig.regens@oag.ok.gov

*Attorney for Defendant Southwestern
Oklahoma State University*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of March, 2013, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and further certify that I transmitted a true and correct copy of the foregoing document to the following person who is a participant of the Court's ECF System:

Donald E. Smolen
Laura M. Lauth
701 S. Cincinnati Avenue
Tulsa, OK 74119
Attorneys for Plaintiff

s/ Craig M. Regens

Craig M. Regens